

Fill in this information to identify the case:

Debtor 1 Erik Andreas Nybo

Debtor 2 Heather Lee Nybo  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PA

Case number 20-02593 MJC

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of Creditor: MIDFIRST BANK Court claim no. (if known): 12

Last 4 digits of any number you use to identify the debtor's account: 8638

Property address:

58 Washington Boulevard  
Williamsport, PA 17701

#### Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 04 / 01 / 2024

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ \_\_\_\_\_

c. Total. Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

*x/s/ Michael Farrington*

Date 04/09/2024

Michael Farrington  
09 Apr 2024, 14:11:08, EDT

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkarroup@kmlawgroup.com](mailto:bkarroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

---

<b>IN RE: Erik Andreas Nybo Heather Lee Nybo</b>	<b>Debtor(s)</b>	<b>BK NO. 20-02593 MJC</b>
<b>MIDFIRST BANK</b>	<b>Movant</b>	<b>Chapter 13</b>
<b>vs.</b>		<b>Related to Claim No. 12</b>
<b>Erik Andreas Nybo Heather Lee Nybo</b>	<b>Debtor(s)</b>	
<b>Jack N. Zaharopoulos,</b>	<b>Trustee</b>	

**CERTIFICATE OF SERVICE  
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on April 15, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Erik Andreas Nybo  
58 Washington Boulevard  
Williamsport, PA 17701

Heather Lee Nybo  
58 Washington Boulevard  
Williamsport, PA 17701

Attorney for Debtor(s) (via ECF)

Paul Donald Murphy-Ahles  
Dethlefs Pykosh & Murphy  
2132 Market Street  
Camp Hill, PA 17011

Trustee (via ECF)

Jack N. Zaharopoulos  
Standing Chapter 13 (Trustee)  
8125 Adams Drive  
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: April 15, 2024

*/s/ Michael P. Farrington*

Michael P. Farrington Esq.  
Attorney I.D. 329636  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(215) 825-6488  
mfarrington@kmllawgroup.com